

Comments for Draft Revisions (*Not Applicable to Directives; Refer to Directive Management Officer for Directive Comment Format*)

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Comments Submitted By: M. Hassan Amini, Michael Cann

Organization: ACE 117A

Phone: 404-474-5549

#	Document Name	Page Number	Paragraph Number	Referenced Text	Comment/Rationale or Question	Proposed Resolution	Comment Type (Conceptual, Editorial, or Format)	Disposition/Response to Comment
1	PS-AIR-21-130-03-01 comment by MC	1	Summary	First paragraph	Define the audience.	Add a sentence to the Summary which states, "although this policy is directed towards TSOA applicants complying with TSO-C127b, it also addresses some installation information associated with non-TSO function (NTF) on TSOA articles."	Conceptual	Accepted. Added the following sentence: "Although this policy is directed towards seat TSO applicants, it also addresses installation information associated with NTFs provided by seat TSO articles."
2	PS-AIR-21-130-03-01 comment by MC	5	A2	A2: To make it clear to the installer (that is, the TC/STC applicant) and FAA that the substantiation and design control for the added functionality or performance may need to be addressed by the TC/STC applicant.	This answer assumes that there is always an TC or STC applicant/holder reviewing the installation. However, the Major Alteration Job Aid (https://www.faa.gov/about/offices/headquarters/offices/afs/afs300/media/Major_Repair_Alteration_Job-Aid.pdf) does not necessarily require an STC for a seat installation. This policy has changed back and forth, however I would suggest commenting on the possibility that it MAY not be done by STC. Address it as INSTALLER.	"A2: To make it clear to the Installer and FAA that the substantiation and design control for the added functionality or performance may need to be further addressed during installation. If the seat installation was approved as part of a type certificate (TC), amended type certificate (ATC), or supplemental type certificate (STC), the design approval holder (DAH) for the TC/ATC/STC must address these functions as part of their approval. However, it is the responsibility of the installer to verify that these non-TSO functions are addressed for their specific aircraft installation, especially if the seat is not being installed based on a TC/ATC/STC."	Conceptual	Partially Accepted. Used the term <i>installer</i> to simplify the approach.

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3	PS-AIR-21-130-03-01 comment by MC	5	A4	<p>A4: Refers to "you must supply it."</p> <p>Although the policy appears to be directed toward TSOA applicants, A2 supplies answers affecting installers or DAHs. This audience should be addressed.</p>	<p>A4: "Typically for seats it is not appropriate to include this type of substantiation data <i>to verify the function of the NTF</i>; however, if the FAA requests this data, the TSOA must supply it. Conversely, it is appropriate and necessary to include substantiation data <u>as part of the TSOA</u> for the NTF and components that compromise the NTF <i>to show compliance to the TSO MPS</i>. It should also be noted that TC/STC/Installers may also need to use (or develop) this data for complete at the installation level. This policy does not require the TSOA to supply the supporting data to a third party, however this policy should make it clear that if the installer or TC/STC applicant does not have access to this data, they may need to develop it in order to be able to install the TSO article."</p>	Conceptual	<p>Partially Accepted. A4 now reads:</p> <p>It is typically not appropriate for seats to include this type of substantiation data to verify the functional performance of the NTF; however, if the FAA requests this data, the TSO holder must supply it. Conversely, it is appropriate and necessary to include substantiation data as part of the TSOA/LODA application for the components that provide the NTF to show compliance to the TSO MPS. It should also be noted that the installer may also need to use (or develop) this data for compliance at the installation level.</p> <p>(Note A4 has been renumbered to A3)</p>
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4	PS-AIR-21-130-03-01 comment by MC	5	Q5	<p>Q5: Do the new TSO-C127b requirements mean that all attributes of the seat not explicitly covered in the TSO would have to be evaluated by the seat manufacturer for their potential to affect compliance to the aircraft airworthiness regulations?</p> <p>A5: No. Non-TSO functions only need to be substantiated for compliance to the seat TSO MPS.</p>	Refers to Seat Manufacturer.	<p>Q5: Do the new TSO-C127b requirements mean that all attributes of the seat not explicitly covered in the TSO would have to be evaluated by the <u>TSOA (seat manufacturer)</u> for their potential to affect compliance to the aircraft airworthiness regulations?</p> <p>A5: No. Non-TSO functions only need to be substantiated for compliance to the seat TSO MPS only. <u>However, the installer or TC/ATC/STC applicant will need to address all applicable functions at the aircraft level.</u></p>	Conceptual	Concur. Made the requested change to Q5.
5	PS-AIR-21-130-03-01 comment by MHA	5	Q5 and A5	<p>Q5: Do the new TSO-C127b requirements mean that all attributes of the seat not explicitly covered in the TSO would have to be evaluated by the seat manufacturer for their potential to affect compliance to the aircraft airworthiness regulations?</p> <p>A5: No. Non-TSO functions only need to be substantiated for compliance to the seat TSO MPS.</p>	This Q&A could be misleading for seat manufacturer. Even though for TSO compliance seat manufacturer is not required to submit data for showing compliance of all attributes of an NTF however it is recommended that they do evaluate all the attributes of an NTF for aircraft airworthiness regulations applicable to intended aircraft that the TSO article is being installed on.	<p>Revise the answer as follow:</p> <p>A5: No. Non-TSO functions only need to be substantiated for compliance to the seat TSO MPS. However it is recommended that seat manufacturer do evaluate all the attributes of an NTF for aircraft airworthiness regulations applicable to intended aircraft that the TSO article is being installed on.</p>	Conceptual	A5 has been clarified to state: "No. Non-TSO functions only need to be substantiated for compliance to the seat TSO MPS. The installer is still required to address all of the applicable aircraft airworthiness requirements for the installation of a seat with integrated non-TSO functionality. These airworthiness requirements may not be addressed by compliance to TSO-C127b alone."

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6	PS-AIR-21-130-03-01 comment by MC	5	A8	<none>	Suggest addressing TSOA Letters for consistency at the ACO level.	"Q8: What information should the ACO reference on the TSOA letter for TSO articles that have NTF? A8: The ACO should provide the same information as a standard TSOA, however the ACO may include reference to any NTFs that the TSOA Applicant has substantiating data for. Since the TSOA need only address the TSO MSP, the ACO may include a note that states "This TSOA does not provide, or imply, system or installation approval for any NTF included herein. Any references to the NTF are based on data showing that the NTF does not prevent the TSOA article from complying with the TSO, based on a non- interference methodology. The ACO recommends that the TSOA Holder make any potential installers aware of the compliance status of any NTF associated with their product." (or something similar)	Conceptual	Not Accepted This comment is out of scope of this policy. Example language for the ACO to provide in the TSOA/LODA authorization letter can be found in Order 8150.1c.
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